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FEB 05 2025

CLERK, U.S. DISTRICT COURT
DULUTH, MINNESOTA

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Chad McKenna

Plaintiff(s),

vs.

Case No. 25-cv-464 LMP/LIB
(To be assigned by Clerk of District Court)

President Donald Trump, Elon Musk, et al

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in this lawsuit. Please attach additional sheets if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name	Chad McKenna
Street Address	6317 Tacony St
County, City	St. Louis County, Duluth
State & Zip Code	MN 55807
Telephone Number	(218) 606-2891

SCANNED

FEB - 5 2025

U.S. DISTRICT COURT DULUTH

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name	Donald Trump
Street Address	1600 Pennsylvania Ave
County, City	Frederick, Washington
State & Zip Code	DC 20500

b. Defendant No. 2

Name	Elon Musk
Street Address	Unknown
County, City	
State & Zip Code	

c. Defendant No. 3

Name	
Street Address	
County, City	
State & Zip Code	

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

Privacy Act of 1974

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☒ Defendant(s) reside in Minnesota ☐ Facts alleged below primarily occurred in Minnesota

☐ Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7.

On or about February 1, 2025, Elon Musk, under the direction of the President, gained access and seized information from the US Treasury Department in Violation of the Privacy Act 1974, as amended, 5 U.S.C. § 552a. According to multiple news reports, Musk and several employees/volunteers requested access to the Treasury Department's payment system and denied. They were able to obtain access to the payment system. Subsection 13.b holds that federal agencies that have collected information may not disclose that information to individuals or organizations except with permission of the person involved or under conditions within the Act. Elon Musk and the employees/volunteers did not have the legal authority to access information in the payment system of the US Treasury which would include citizen information including name - name, social security number, address, income, family members, bank account information, and other sensitive, private information. The harm is a violation of privacy and tantamount to espionage under 18 USC Ch 37.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

Order the Executive branch to disclose what files were accessed by unauthorized individual, revoke the security clearance and badges from all persons involved, and order the FBI to conduct an investigation into the matter.

Signed this **5th** day of **February**, _____

Signature of Plaintiff



Mailing Address

6317 Tacony St. Duluth, MN 55807

Telephone Number

(218) 606-2891

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.